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Katrina Shankland 2300A College Ave. Stevens Point, WI 54481 715-881-1880 voteshankland@gmail.com

HAND DELIVERED

STATE OF WISCONSIN

Before the Government Accountability Board

The Complaint of Katrina E. Shankland, Complainant

against

David J. Verhage, Respondent

VERIFIED COMPLAINT

- I, Katrina E. Shankland, primarily based on public records and information, hereby allege as follows:
 - 1. This Complaint is brought against David J. Verhage, pursuant to GAB Chapter 2.05, 2.07 and 8.40, administrative code.
 - 2. I am a qualified elector in and resident of the State of Wisconsin and Assembly District 71.
 - 3. Respondent maintains an address at 2610 LaNaeh Lane, Village of Plover, WI, 54467.
 - 4. On or about May 31, 2012, Respondent filed nomination papers containing 226 nomination signatures with the Government Accountability Board to be placed on the ballot for the August 14, 2012 primary for Assembly District 71.
 - 5. Wis. Stat 8.15(6)(c) provides that the number of required signatures on nomination papers for the office of Representative to the Assembly shall not be less than 200 or more than 400 electors.
 - 6. Respondent's nomination papers contained a total of 27 signatures with insufficiencies pursuant to GAB Chapters 2.05 and 2.07, Wisconsin Administrative Code, bringing the total number of valid signatures submitted down to 199. A list of the insufficient signatures that fall out of Assembly District 71 is attached hereto and incorporated herein as Page 2-28 and Exhibits A-D. Additional insufficient signatures, ranging from invalid dates, addresses, and municipalities are documented through Page 2-28.
 - 7. Complainant respectfully submits that these facts warrant the Board's attention, and the Board should take prompt action to eliminate from the nomination papers filed by Respondent all signatures that are insufficient pursuant to GAB Chapters 2.05 and 2.07, Wisconsin Administrative Code and should find that

Respondent does not meet the number of signatures required by Wis. Stat. 8.15(6)(c) to be placed on the ballot for the August 14, 2012 primary election and the November 6, 2012 general election in the 71st Assembly District.

Municipality of Residence Out of Assembly District 71*

- 1. Page 1, Signatures 7, 9, 10. Three municipalities out of district in the town of Hull.
- 2. Page 1, Signature 8. One municipality out of district in the village of Almond.
- 3. Page 2, Signature 3. One municipality out of district in the town of Hull.
- 4. Page 3, Signature 5. One municipality out of district in Assembly District 85.
- 5. Page 3, Signature 6. One municipality out of district in the town of Bevent.
- 6. Page 3, Signature 9. One municipality out of district in the town of Hull.
- 7. Page 4, Signatures 8, 10. Two municipalities out of district in the town of Hull.
- 8. Page 5, Signature 5. One municipality out of district in the town of Hull.
- 9. Page 5, Signature 9. One municipality out of district in the town of Hull.
- 10. Page 5, Signature 10. One municipality out of district in the town of Hull.
- 11. Page 8, Signature 10. One municipality out of district in the town of Bevent.
- 12. Page 10, Signature 6. One municipality out of district in the town of Hull.
- 13. Page 12, Signatures 4, 5. Two municipalities out of district in the town of Hull.
- 14. Page 13, Signature 6. One municipality out of district in the town of Hull.
- 15. Page 14, Signatures 4, 5, 6. Three municipalities out of district in the town of Hull.
- 16. Page 17, Signatures 8, 9, 10. Three municipalities out of district in the town of Hull.
- 17. Page 18, Signature 2. One municipality is out of district in the town of Hull.
- 18. Page 18. Signature 5. One municipality is out of district in Assembly District 70.
- 21. Page 21, Signature 3. One municipality is out of district in the town of Hull.

TOTAL: 27 signatures are insufficient as they are out of Assembly District 71.

*See Exhibit A – Assembly District 71 Map, Who Are My Legislators, and Voter Public Access Documentation

Municipality of Residence Incomplete

- 1. Page 1, Signatures 1, 2, 3, 4, 5, 7. No municipality of residence is indicated.
- 2. Page 2, Signatures 1, 2, 3, 4, 5, 6, 9, 10. No municipality of residence is indicated.
- 3. Page 3, Signature 10. No municipality of residence is indicated.
- 4. Page 4, Signatures 1-10. No municipality of residence is indicated.
- 5. Page 5, Signatures 4, 8. No municipality of residence is indicated.
- 6. Page 6, Signatures 1-10. No municipality of residence is indicated.
- 7. Page 7, Signatures 1, 2, 3, 4, 5, 10. No municipality of residence is indicated.
- 8. Page 10. Signatures 1-10. No municipality of residence is indicated.
- 9. Page 13, Signature 3. No municipality of residence is indicated.
- 10. Page 18, Signatures 1-10. No municipality of residence is indicated.
- 11. Page 22, Signature 5. No municipality of residence is indicated.
- 12. Page 24, Signatures 1-3. No municipality of residence is indicated.

TOTAL: 68 signatures are insufficient as the municipality of residence is incomplete.

Invalid Municipality of Residence

1. Page 18, Signature 8. The municipality of residence is indicated as a city, and is not complete. In fact the municipality of residence is a town.

Invalid Address*

- 1. Page 2, Line 4. The address is not valid per the U.S. Postal Service and Voter Public Access information.
- 2. Page 13, Line 5. The address is not valid per the U.S. Postal Service and Voter Public Access information.
- 3. Page 23, Line 2. The address is not valid per the U.S. Postal Service and Voter Public Access information.

Incomplete Addresses

- 1. Page 22, Signatures 2, 3, 4, 5. The address at 5625 Sandpiper Drive is an assisted living facility. Each signature (2, 3, 4, and 5) is missing the apartment number. All four addresses are incomplete. *See Exhibit D for documentation.
- 2. Page 3, Signature 10. Address does not include street number ("Henrietta St.")
- 3. Page 5, Signature 1. Multiple municipalities are checked.
- 4. Page 5, Signature 6. The address is in the wrong field and the signature is in the wrong field.
- 5. Page 11, Signatures 1, 2, 3, 4, 5, 6. No municipality is indicated in the mailing address field.
- 6. Page 11, Signature 6. The street name is incomplete.
- 7. Page 12, Signature 9. The street name is incomplete.
- 8. Page 26, Signature 2. The street name is incomplete.
- **9.** Page 14, Signatures 1, 2, 3, 4. No municipality is indicated in the mailing address field.
- 10. Page 15, Signatures 2, 3, 4, 5, 6. No municipality is indicated in the mailing address field.
- 11. Page 16, Signatures 1-10. No municipality is indicated in the mailing address field.
- 12. Page 19, Signatures 1, 2, 3. No municipality is indicated in the mailing address field.
- 13. Page 20, Signature 5. The address is incomplete: street type is not given and address number is unreadable.
- 14. Page 21, Signatures 1, 2, 4. No municipality is given in the mailing address.
- 15. Page 29, Signature 1, 2. No municipality is indicated in the mailing address.
- 16. Page 30, Signatures 1, 2, 3, 4, 5, 6, 7. No municipality is indicated in the mailing address.

TOTAL: 50 signatures are insufficient as the mailing address is incomplete.

^{*}Exhibit C: U.S. Postal Service and Voter Public Access Documentation

Illegible Addresses

- 1. Page 9, Signature 5. The address is unreadable.
- 2. Page 9, Signature 10. The address is unreadable.
- 3. Page 26, Signature 2. The street name is unreadable.
- 4. Page 19, Signature 9. The street name is unreadable.
- 5. Page 20, Signature 5. The address number is unreadable.

TOTAL: 5 signatures are insufficient as the address is illegible.

Circulator Address is Not Valid*

 Page 21, Circulator Charles R. Bossingham's address is not valid. It is listed as 511 Ramble Lane, Plover, WI. A search for the voter address on USPS and Voter Public Access does not yield any results.

*See Exhibit B - U.S. Postal Service and Voter Public Access Documentation

Insufficient Signatures

- 1. Page 2, Signatures 3, 5, 6. The names are printed, not signed.
- 2. Page 3, Signatures 2, 3. The names are printed, not signed.
- 3. Page 4, Signature 3. The name is printed, not signed.
- 4. Page 5, Signature 6. The name is printed, not signed. The signature is in the wrong field.
- 5. Page 6, Signatures 9, 10. The names are printed, not signed.
- 6. Page 7. Signature 9. The name is printed, not signed.
- 7. Page 8, Signatures 2, 3. The names are printed, not signed.
- 8. Page 9, Signatures 5, 6. The names are printed, not signed.
- 9. Page 10, Signatures 2, 4, 5, 6, 9, 10. The names are printed, not signed.
- 10. Page 13, Signatures 5, 6. The name is printed, not signed.
- 11. Page 15, Signature 4. The name is printed, not signed.
- 12. Page 16, Signatures 3, 8, 9. The names are printed, not signed.
- 13. Page 18, Signature 3. The name is printed, not signed.
- 14. Page 23. Signatures 2, 3. The name is printed, not signed.
- 15. Page 30, Signature 4. The name is printed, not signed.

TOTAL: 30 signatures are insufficient as they are not valid signatures.

Dates Omitted

- 1. Page 1, Signature 6. Date is missing year 2012. The affidavit submitted by David J. Verhage does not include page 1 to correct this insufficiency.
- 2. Page 7, Signature 6. Date is not included. This insufficiency is not covered by the affidavit submitted to correct the date insufficiencies on the page, as the affidavit only indicates the year 2012 and not the full date.

Insufficient Affidavits

- 1. The affidavit filed by Jerald W. Knuth on May 31, 2012 does not indicate whether Cheryl Schymanski is a notary public or other person authorized to administer oaths.
- 2. The affidavit filed by Charles R. Bossingham on May 31, 2012 does not indicate in the checkbox whether Carol A. Teschner is a notary public or other person authorized to administer oaths.

I, Katnna E. Shankland, being first duly sworn, on oath, state that I
personally read the above complaint, and that the above allegations are true based on
my personal knowledge and, as to those stated on information and belief, I believe them
to be true.

Dated this 4 of June, 2012.

Respectfully submitted,

Katuu E. Sundand

Katrina E. Shankland

STATE OF WISCONSIN)

(county of notarization)

Sworn to before me this 4 day of 5

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(Signature of person authorized to administer oaths)

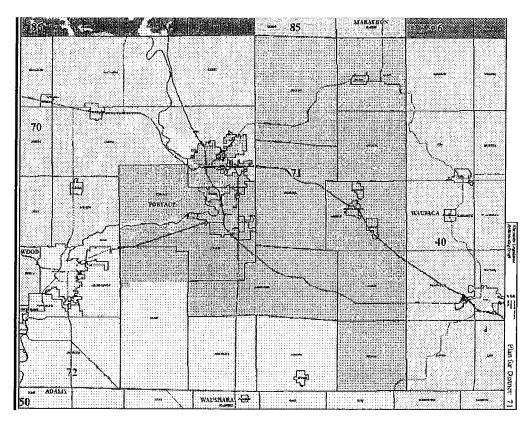
My commission expires ______, or s perm Notary Public or official title if not notary)

Exhibit A

Map taken from the Assembly District 71 Map based on 2011 Wisconsin Act 43 & 44.

Map can be accessed at: http://legis.wisconsin.gov/ltsb/redistricting/PDFs/AD71.pdf

The 71st Assembly District does not include the town of Hull, the village of Almond, or the town of Bevent.



1. Page 1, Signature 7. 490 Casimir Rd W. Stevens Point, WI 54481. Address search on Voter Public Access (vpa.wi.gov) yields the municipality of residence as Town of Hull. Using the Assembly District 71 Map based on 2011 Wisconsin Act 43 & 44, one can see the Town of Hull is in Assembly District 70.

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*	Phone2 (715) 344-8331					
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2. Page 1, Signature 9. 1813 Bobby Lane, Stevens Point, WI 54482.

Address search on Voter Public Access (vpa.wi.gov) yields the municipality of residence as Town of Hull. Using the Assembly District 71 Map based on 2011 Wisconsin Act 43 & 44, one can see the Town of Hull is in Assembly District 70.

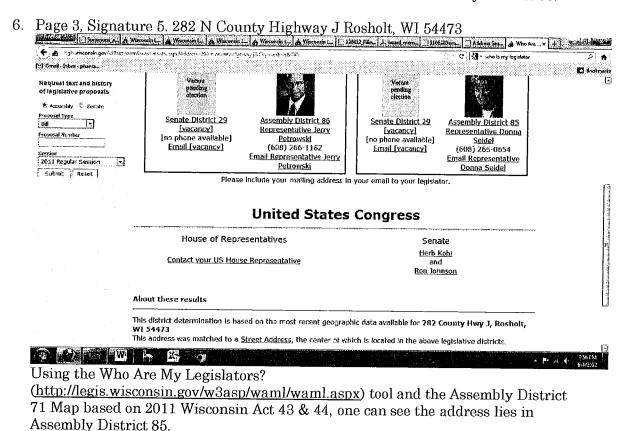
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3. Page 1, Signature 10. 1813 Bobby Lane, Stevens Point, WI 54482.

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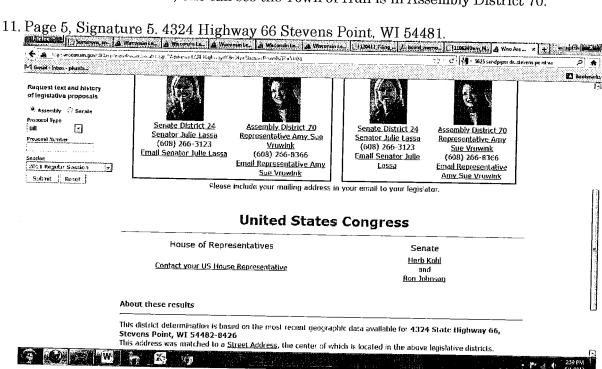
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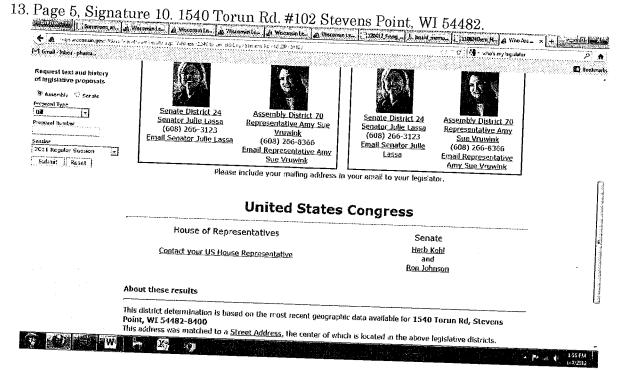
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Address search on Voter Public Access (vpa.wi.gov) does not yield the municipality of residence. Using the Who Are My Legislators? (http://legis.wisconsin.gov/w3asp/waml/waml.aspx) tool and the Assembly District 71 Map based on 2011 Wisconsin Act 43 & 44, one can see the Town of Hull is in Assembly District 70.

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Address search on Voter Public Access (vpa.wi.gov) does not yield the municipality of residence. Using the Who Are My Legislators? (http://legis.wisconsin.gov/w3asp/waml/waml.aspx) tool and the Assembly District 71 Map based on 2011 Wisconsin Act 43 & 44, one can see the Town of Hull is in Assembly District 70.

14. Page 8, Signature 10. 2375 Pulaski Rd. Rosholt, WI 54473.

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	TOWN OF HULL 46E0 WOOCK MEMORIAL OR				
	STEVENS POINT, WI 54482-8738 Phone (715) 344-8280				

16. Page 12, Signature 4. 1629 Casimir Rd. Stevens Point, WI 54481.

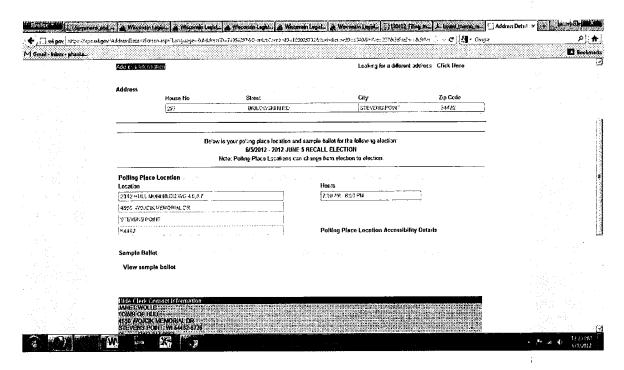
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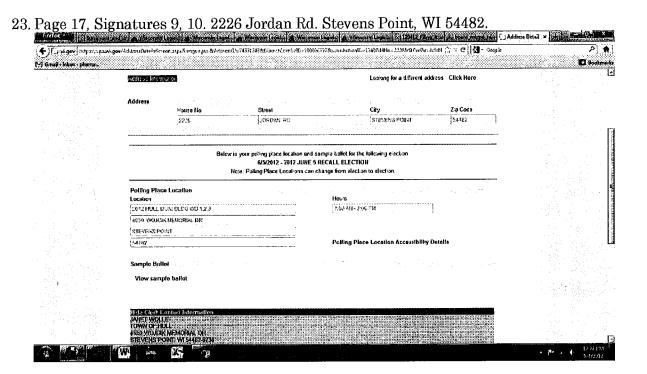
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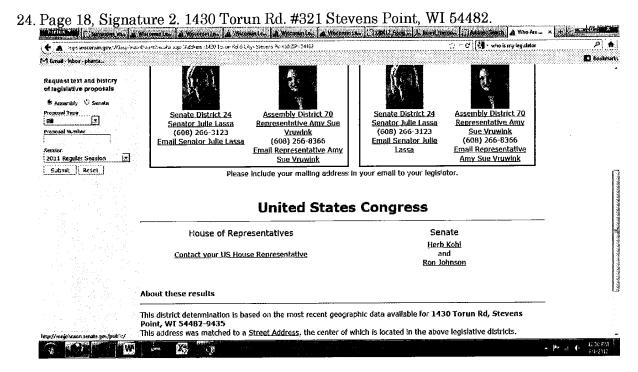
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- 20. Page 14, Signature 5. 1886 Gertrude Lane, Stevens Point WI. See Line 12.
- 21. Page 14, Signature 6. 1886 Gertrude Lane, Stevens Point WI. See Line 12.
- 22. Page 17, Signature 8. 227 Brilowski Rd. N Stevens Point, WI 54482.

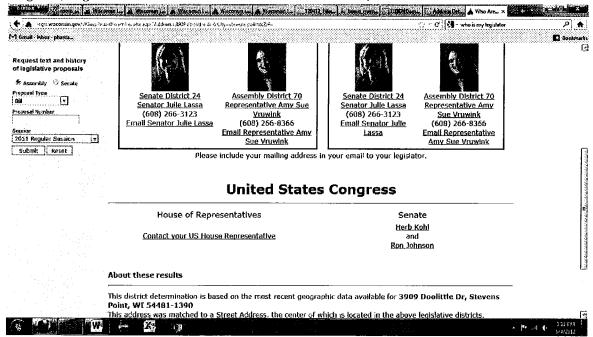






Address search on Voter Public Access (vpa.wi.gov) does not yield the municipality of residence. Using Who Are My Legislators? (http://legis.wisconsin.gov/w3asp/waml/waml.aspx), the address at Torun Rd. falls in Assembly District 70. Using the Assembly District 71 Map based on 2011 Wisconsin Act 43 & 44, one can see the Town of Hull is in Assembly District 70.

25. Page 18, Signature 5. 3909 Doolittle Dr. Stevens Point, WI 54481.



Upon an address search using Using Who Are My Legislators? (http://legis.wisconsin.gov/w3asp/waml/waml.aspx), the address at Doolittle Dr. falls in Assembly District 70.

26. Page 21, Signature 3. 5680 Golla Rd. Stevens Point, WI 54482.

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Exhibit B

511 Ramble Lane, Plover, WI 54467 does not exist as a valid address on both the U.S. Postal Service's website and the Voter Public Access website.

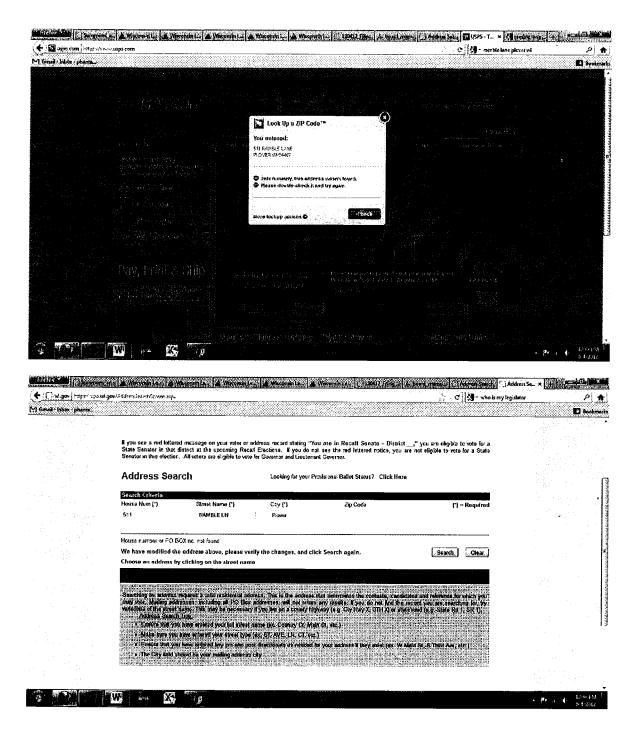
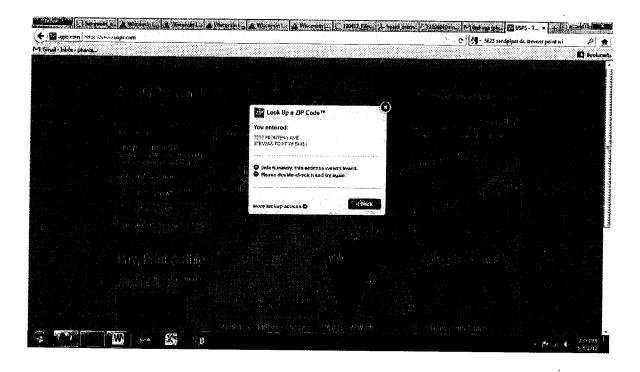
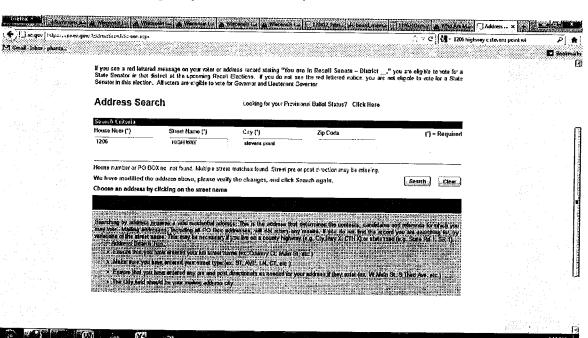


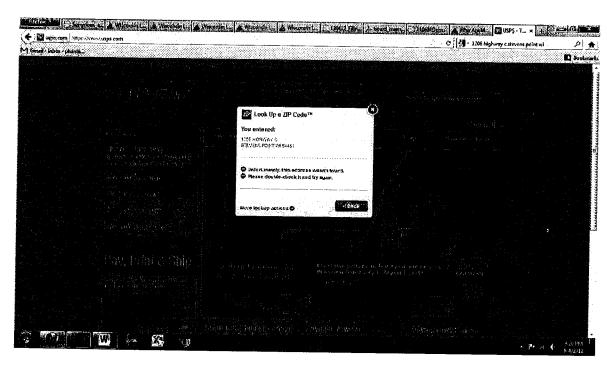
Exhibit C

Page 2, line 4. 2002 Frontena Ave. Stevens Point does not exist.

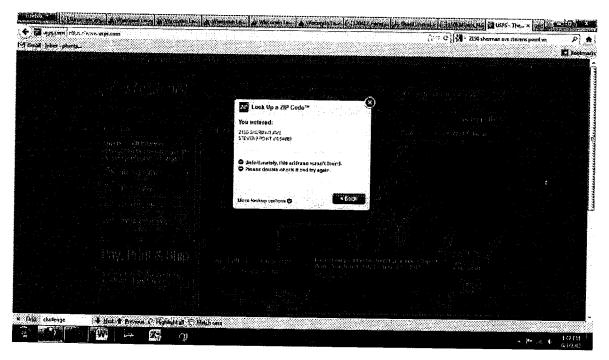


Page 13, Line 6. 1206 Highway C Stevens Point, WI 54481.





Page 23, Line 2. 2150 Sherman Ave. Apt 21 Stevens Point, WI.



The address is not recognized by the U.S. Postal Service or the Voter Public Access sites.

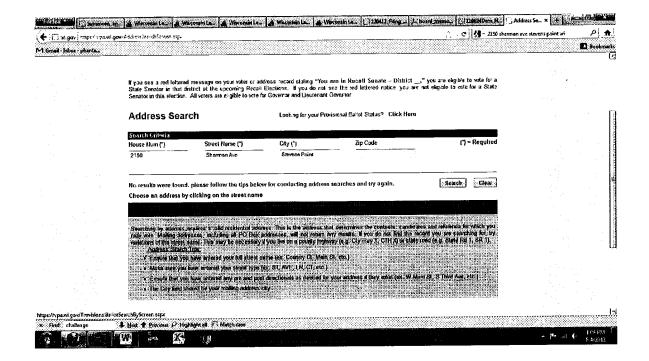


Exhibit D

The address at 5625 Sandpiper Dr. Stevens Point, WI is an assisted living and retirement community. Each signature at this address must include the apartment number in order to be sufficiently complete.

The retirement community's website is http://www.emeritus.com/wisconsin/stevens-point-assisted-living/oakridge.

